

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

VERONICA HINTON,	)	
	)	
Plaintiff,	)	Case No. 24 CV 12017
	)	
v.	)	Judge John J. Tharp, Jr.
	)	
THE CITY OF CHICAGO, et al.,	)	Magistrate Judge Maria Valdez
	)	
Defendants.	)	

**DEFENDANTS' UNOPPOSED JOINT MOTION FOR EXTENSION OF TIME  
TO FILE RESPONSIVE PLEADINGS TO PLAINTIFF'S FIRST AMENDED  
COMPLAINT**

Defendant City of Chicago (“the City”), by and through one of its attorneys, Simerdeep Kaur, Assistant Corporation Counsel for the City of Chicago and Defendant Matthew Bryant, by and through one of his attorneys, Brian Siegel, Assistant Corporation Counsel for the City of Chicago, and for their Motion for Extension of Time to File a Responsive Pleading to Plaintiff’s First Amended Complaint, state as follows:

1. This matter involves various federal and state law claims brought against Defendants by Plaintiff, Veronica Hinton, related to incidents occurring on August 11, 2024, and October 16, 2024. Dkt. No. 30.

2. On July 14, 2025, this Court granted the Defendants’ motions to dismiss Plaintiff’s Complaint and allowed Plaintiff until August 8, 2025, to file a First Amended Complaint. Dkt. No. 29.

3. Plaintiff timely filed her First Amended Complaint. Dkt. No. 30.

4. Lead counsel for Defendant Bryant recently departed from his employment with the City of Chicago and has withdrawn his appearance. Dkt. No. 32.

5. A new lead counsel and supervising attorney has been assigned, with his appearance forthcoming. However, new lead counsel is currently in trial preparation for a trial set to begin on August 25, 2025<sup>1</sup>, in the Cook County Circuit Court Law Division. The trial is expected to last one week. Thereafter, supervising counsel for the City, Ms. Moore, will be preparing for trial set to begin on September 15, 2025<sup>2</sup>, in the Cook County Circuit Court Law Division. The trial is expected to last two weeks. Additionally, lead counsel for the City has two discovery deadlines, two responsive pleadings, and a motion for summary judgment due between September 1 and September 15, 2025.

6. In light of the competing professional deadlines, Defendants respectfully request a 30-day extension of time to file their responsive pleadings. The additional time will allow new counsel to familiarize himself with this matter and for all counsel to meet and confer to file the most appropriate and complete responsive pleading to Plaintiff's First Amended Complaint.

7. This motion is not presented for purposes of delay, and no prejudice will be suffered by any party as a result of the requested extension.

8. The parties conferred, and Plaintiff does not oppose Defendants' requested extension.

**WHEREFORE**, Defendants jointly request this court grant them a 30-day extension through and including September 22, 2025, to file their responsive pleadings, and for any other relief this Court deems appropriate.

Date: August 22, 2025.

Respectfully submitted,

/s/ Simerdeep Kaur

Simerdeep Kaur

Assistant Corporation Counsel

Marion C. Moore, Chief Assistant Corporation Counsel  
Simerdeep Kaur, Assistant Corporation Counsel  
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<sup>1</sup> *Vicko Gluncic v. City of Chicago*, Case No. 2023L5242.

<sup>2</sup> *Tasha' Roberts v. City of Chicago, et al.*, Case No. 2023L8504.

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